IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

CATHERINE AND RICHARD SNYDER,	)	
	)	
Pro Se Plaintiffs,	)	
	)	
v.	)	No. 1:07-cv-469
	)	
GREENBERG TRAURIG, LLP, *et al.*	)	
	)	
Defendants.	)	
	)	

EMERGENCY MOTION ON BEHALF OF THREE INDIVIDUAL DEFENDANTS FOR TWO-WEEK ENLARGEMENT OF TIME TO FILE INITIAL RESPONSE TO COMPLAINT

Last Thursday, undersigned counsel moved for a two-week enlargement of time in which to file an initial response under Rule 12 of the Federal Rules of Civil Procedure on behalf of Defendant Greenberg Traurig, LLP ("Greenberg Traurig"). This Court granted that motion in an Order entered Friday, extending the deadline for Greenberg Traurig's response to Monday, June 25. Now, the three individually named defendants—Harley Lewin, Janet Shih Hajek and Steve Wadyka ("the individual defendants")—have asked undersigned counsel to represent them personally in this matter. This court has docketed their initial responses as being due today, the date that Greenberg Traurig's initial responses were due before this Court granted the extension.

The individual defendants still have not been properly served pursuant to Rule 4(c) of the Federal Rules of Civil Procedure. Service has been effected only on Greenberg Traurig, not on Ms. Hajek, Mr. Wadyka and Mr. Lewin *individually*. Despite that defect, if this Court grants the instant motion for enlargement of time, the individual defendants hereby agree to waive any objection to proper service and thus submit themselves to this court's jurisdiction. Accordingly, because the individual defendants have virtually identical grounds for seeking the same relief,

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and because the case will proceed in a more orderly manner if the filing deadlines are congruent, they hereby move for the same relief granted to Greenberg Traurig and request that the deadline for their initial response be extended until Monday, June 25, 2007.

This motion is not made for purposes of improperly delaying this action, and the granting of this motion would not unfairly benefit the movants or prejudice the plaintiffs.

Dated: June 11, 2007

Respectfully submitted,

HARRIS, WILTSHIRE & GRANNIS, LLP

_______________/s/__________________

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CATHERINE AND RICHARD SNYDER,	)	
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Pro Se Plaintiffs,	)	
	)	
v.	)	No. 1:07-cv-469
	)	
GREENBERG TRAURIG, LLP, *et al.*	)	
	)	
Defendants.	)	
	)	

PROPOSED ORDER GRANTING EMERGENCY MOTION FOR TWO-WEEK ENLARGEMENT OF TIME TO RESPOND TO COMPLAINT NUNC PRO TUNC

For the reasons set forth in the Emergency Motion on Behalf of Individual Defendants for Two-Week Enlargement of Time to File Initial Response to Complaint, the Court hereby GRANTS the motion and ORDERS all defendants to respond to the Complaint no later than Monday, June 25, 2007, *nunc pro tunc* to June 11, 2007.

The Clerk is ORDERED to reset the response deadline in the docket accordingly.

SO ORDERED.

____
The Honorable Gerald Bruce Lee
United States District Court Judge
Eastern District of Virginia

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Emergency Motion on Behalf of Individual Defendants for Two-Week Enlargement of Time to File Initial Response to Complaint, was sent to *pro se* Plaintiffs Catherine Snyder and Richard Snyder by first-class mail on this 11th day of June, 2007, at the following address:

Catherine Snyder and Richard Snyder
603 Nash Street
Herndon, VA 20170

______/s/____________

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